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State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

XXXXXXXXXXXX  
Joseph F. Harkins, Secretary  
Barbara J. Sabol, Secretary

Forbes Field  
Topeka, Kansas 66620  
913-862-9360



May 17, 1983

Mr. David Trombold  
Reid Supply Co.  
P.O. Box 11365  
Wichita, Kansas 67202

Re: EPA I.D. No. KSD 007246846  
Reid Supply Co., 2549 N. New York  
Wichita, Kansas 67219

EPA-ARWM/PMTS  
MAY 20 1983  
Region VII K.C., MO

Dear Mr. Trombold:

The U.S. Environmental Protection Agency (EPA) and this department have completed a joint preliminary review of your Part B application. Our comments are summarized below:

General Description of Facility and Part A Application Review

1. Your original notification 8700-12 must be amended to be consistent with your Part A and Part B applications. Specifically, waste codes F007 and F008 reported on your revised Part A must be added on your revised 8700-12.
2. The unit of measure must be included on Page 1 of Form 3 of the Part A application. Both Form 1 and Form 3 should be signed by the same individual(s). Please refer to 40 CFR 122.6 for signatory requirements.
3. Does the design capacity reported on page 1 of Form 3 include the "future" drum storage area?
4. After reviewing the layout map contained in the Part B, the issue arises whether the two facilities (areas) are contiguous. The definitions of facility and on-site are outlined below. We request you review the definitions and their operation and provide information in the response as to whether or not the two facilities (areas) are contiguous.

"Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).



R00001526  
RCRA Records Center

"On-site" means the same or geographically contiguous property which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which he controls and to which the public does not have access, is also considered on-site property.

Topographic Maps (122.25(a)(19))

5. Since the regulations require a map scale of 1 inch equal to not more than 200 feet, you must submit a waiver request for the map scale requirements.
6. If you cannot provide the date and source of the windrose information, you must submit a waiver request for this requirement too.
7. Figure 2 indicates surface water flows around the facility boundaries. Any surface water flows including intermittent streams on-site must also be shown preferably on the facility map. If there are no surface waters, please state that in your response.

Traffic Patterns (122.25(a)(10))

8. The application must address any traffic controls and traffic control signals on-site and along the road between the two areas.

Chemical and Physical Analyses (264.13(a) and 122.25(a)(2))

9. Please note that the waste streams F007 and F008 are listed for toxicity and reactivity. Are these wastes which you have proposed to handle in Table 1, EP Toxic too?
10. The following information must be provided:
  - A. The applicable hazardous waste analyses should be performed on all waste streams at least annually. The regulations require that the analysis must contain all information which must be known to treat store and dispose of the waste in accordance with the regulations. The regulations also include additional requirements for off-site facilities, such as Reid Supply.
  - B. The sampling methods must meet the requirement of Part 261, Appendix I, and test methods are discussed in Appendix III of Part 261.

Security Procedures

11. For clarity, the fences and barriers should be shown on the layout map. The location of the "Danger-Unauthorized Personnel Keep Out" signs should also be shown on the layout map.

General Inspection Requirements (264.15 and 122.25(a)(5))

12. The inspection schedule must also include inspection of loading/unloading areas. Also state how often emergency communication systems like alarm and/or two-way radio are checked.
13. The discussion in the application on 264.17(C) requirements should be reworded to include both repairs resulting from an inspection and remedial actions.

Preparedness and Prevention (Part 264, Subpart C)

14. It is our recommendation that alarm switches be located in the drum storage areas.
15. Water at adequate volume and pressure to supply water hoses, automatic sprinklers or water spray systems must be addressed in the application.
16. Is the testing of required equipment, as included in the inspection schedule done by visual inspection only or is the equipment tested on some schedule?
17. How was the aisle space determined to be adequate? Please refer to the National Fire Protection Association's "Flammable and Combustible Liquids Code" for further information on aisle space in areas where ignitable wastes are stored. Primary and secondary aisle spaces should be shown on Figure 15 for clarity.
18. Have any arrangements been made with state emergency response teams, emergency response contractors and equipment suppliers? If no, the application must explain why.

General Requirements For Ignitable, Reactive or Incompatible Wastes (264.17, 264.36 and 122.25(a)(a))

19. Since you have proposed to handle F007 and F008 wastes considered as reactive, please address how the above mentioned requirements will be complied with.

Contingency Plan and Emergency Procedures (Part 264, Subpart D and 122.25(a)(7))

20. A general description of the facility should be included in the contingency plan, since copies of the plan will be received by persons who may not be familiar with different operations at the site.
21. When is a leak considered "small" or "large"? What is the rationale for notifying the emergency coordinator only in case of "larger" leaks?
22. Please designate the alternate emergency coordinator. Is the assistant emergency coordinator same as alternate?

23. A map showing the location of emergency equipment should be attached to the contingency plan.
24. Please state that the emergency coordinator has the authority to commit the necessary resources needed to carry out the contingency plan.

Closure Plans (Part 264, Subpart G and 122.25(1)(13))

25. The engineer certifying closure should visit the site during closure. Also note that he must be a Professional Engineer registered in Kansas.

Cost Estimates

26. The closure cost estimate must include the engineer certification costs.
27. What is the year for which the cost estimates are based upon?

Financial Assurance Documents

28. The Irrevocable Letter of Credit submitted by you does not satisfy the financial requirements. The wording of the instrument must be as stated in 264.151(d).
29. As stated in 264.143(d) a closure Letter of Credit must also be accompanied by a standby trust fund. Under the terms of the letter of credit, all amounts paid pursuant to a draft by the Regional Administrator (RA) or the Secretary of the Department will be deposited by the issuing institution directly into the standby trust fund in accordance with the instruction of the RA or the Secretary. We are advising you to read 264.143(d) for other requirements. The standby trust fund could be established with a nominal sum.
30. The wording of the certificate of liability insurance must be identical to 264.151(j).

Container Standards

31. In regard to the process design capacity, please refer to our comment #3.
32. From Figure 15, it is unclear whether the base is sloped towards the sump. Please note that as stated in 264.175, the base should be sloped or the containment system must be designed and operated to drain and remove liquids from leaks, spills or precipitation.
33. The application must address in more detail the 264.176 requirement for ignitable waste in containers. If you desire to obtain a waiver from these requirements, the waiver must contain more detailed information that would include, but not be limited to, layout map illustrating all distances including distances to off-site buildings, discussion on local fire codes and potential impacts of fire or explosion.

34. It is our recommendation that all containment systems should be of concrete. An asphalt base is not preferred due to the nature of the wastes handled.

Tank Standards

35. In order to better understand the facility operation, the application must include a layout map and a flow diagram illustrating the locations of all tanks discussed in the Part B application and their purpose in the storage and distillation operations and the location of the drum storage areas. In order to determine which tanks prior to the distillation unit must be regulated, we will need to review information on the tanks. This information should include a discussion of the movement of the wastes and time of storage at each location. You are also advised to note that hazardous wastes beneficially reused or recycled are subject only to the storage and transportation requirements as stated in 261.6. Treatment operations are exempt under the present regulations. Our general comments are presented below, even though it is unclear at the present time which tank(s) will need a permit.
- A. Please address in detail the procedures for emptying tanks to allow for entry and inspection when necessary to detect corrosion or erosion of tank sides and bottom.
  - B. Controls to prevent overfilling (e.g. waste feed cut off system or bypass system to a standby tank) are not adequately addressed for the chlorinated solvent storage tank.
  - C. The application must address in more detail the 264.198 requirements and if a waiver is requested adequate justification will be needed as stated in our comment #33.
  - D. As discussed during our meeting with you on February 24, 1983, KDHE will require all hazardous waste storage tanks to have a dike around it. This diking should be preferably of concrete in order to be compatible with the solvents. The capacity of this secondary containment will be at least equal to the capacity of largest tank in the diked area. Procedures for adequate handling of the waste material accumulated in the containment system must also be addressed.

Please note that our review comments are only for completeness. Our technical review will commence only after the application is considered complete. If any of the information required in this letter is not applicable, you will need to state that fact in your response and explain why. For information requested where your operation differs from the regulatory requirement, you may submit a waiver request for our review. When preparing the response to this letter you can provide revised application pages with a cover letter or respond to the comments in a letter and revise the application after all review comments have been resolved. We have also enclosed blank copies of 8700-12 notification forms and a Part A application for your use.

Mr. David Trombold  
Page 6  
May 17, 1983

You are advised to submit a written response to this letter by June 29, 1983. Failure to furnish the requested information could result in an enforcement action.

If you have any questions, please feel free to contact this office.

Sincerely yours,

DIVISION OF ENVIRONMENT

*Vivek Kamath*

Vivek Kamath  
Hazardous Waste Management Section  
Bureau of Environmental Sanitation

VK:bsk  
Enclosures  
cc: Dale Stuckey  
Karen Flournoy ✓